



*Where ideas connect*

Department of Environmental Quality  
Division of Air Quality

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## Title V Operating Permit

**PERMIT NUMBER: 500020002**

**DATE OF PERMIT: September 30, 2003**

Date of Last Revision: September 30, 2003

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This Operating Permit is issued to, and applies to the following:

**Name of Permittee:**

Logan Coach Incorporated  
870 W 800 N  
Logan, UT 84321

**Permitted Location:**

Trailer Manufacturing Plant  
870 W 800 N  
Logan, UT 84321

UTM coordinates: 4,622,006 meters Northing, 428,893 meters Easting  
SIC code: 3999

## ABSTRACT

Logan Coach manufactures horse trailers and is located in an attainment area for all pollutants. Painting equipment used in the manufacturing process consists of four down draft paint booths, one horizontal draft paint booth, and two bake ovens. Logan Coach is a major source of hazardous air pollutants.

## UTAH AIR QUALITY BOARD

By:

Prepared By:

Richard W. Sprott, Executive Secretary

Robert Grandy

## Operating Permit History

7/10/1998 - Permit issued	Action initiated by an initial operating permit application	
5/1/2003 -Permit modified	Action initiated by an administrative amendment (initiated by source)	Added two natural gas heaters to equipment list.
9/30/2003 - Permit issued	Action initiated by a renewal of an operating permit	

## Table of Contents

<b>SECTION I: GENERAL PROVISIONS.....</b>	<b>1</b>
I.A.    FEDERAL ENFORCEMENT.....	1
I.B.    PERMITTED ACTIVITY(IES).....	1
I.C.    DUTY TO COMPLY.....	1
I.D.    PERMIT EXPIRATION AND RENEWAL.....	2
I.E.    APPLICATION SHIELD.....	2
I.F.    SEVERABILITY.....	2
I.G.    PERMIT FEE.....	2
I.H.    NO PROPERTY RIGHTS.....	2
I.I.    REVISION EXCEPTION.....	3
I.J.    INSPECTION AND ENTRY.....	3
I.K.    CERTIFICATION.....	3
I.L.    COMPLIANCE CERTIFICATION.....	3
I.M.    PERMIT SHIELD.....	4
I.N.    EMERGENCY PROVISION.....	5
I.O.    OPERATIONAL FLEXIBILITY.....	5
I.P.    OFF-PERMIT CHANGES.....	5
I.Q.    ADMINISTRATIVE PERMIT AMENDMENTS.....	5
I.R.    PERMIT MODIFICATIONS.....	6
I.S.    RECORDS AND REPORTING.....	6
I.T.    REOPENING FOR CAUSE.....	7
I.U.    INVENTORY REQUIREMENTS.....	8
<b>SECTION II: SPECIAL PROVISIONS.....</b>	<b>9</b>
II.A.    EMISSION UNIT(S) PERMITTED TO DISCHARGE AIR CONTAMINANTS.....	9
II.B.    REQUIREMENTS AND LIMITATIONS.....	9
II.B.1 <u>Conditions on permitted source (Source-wide)</u> .....	9
II.B.2 <u>Conditions on Down Draft Paint Booths ( 1)</u> .....	11
II.B.3 <u>Conditions on Horizontal Draft Spray Booth ( 2)</u> .....	12
II.C.    EMISSIONS TRADING.....	12
II.D.    ALTERNATIVE OPERATING SCENARIOS.....	12
<b>SECTION III: PERMIT SHIELD .....</b>	<b>12</b>
<b>SECTION IV: ACID RAIN PROVISIONS.....</b>	<b>12</b>

**Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.**

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

**Section I: General Provisions**

**I.A. Federal Enforcement.**

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

**I.B. Permitted Activity(ies).**

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

**I.C. Duty to Comply.**

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay

any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

**I.D. Permit Expiration and Renewal.**

**I.D.1 This permit is issued for a fixed term of five years and expires on September 30, 2008.** (R307-415-6a(2))

**I.D.2** Application for renewal of this permit is due by March 30, 2008. An application may be submitted early for any reason. (R307-415-5a(1)(c))

**I.D.3** An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

**I.D.4** Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

**I.E. Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

**I.F. Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

**I.G. Permit Fee.**

**I.G.1** The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

**I.G.2** The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

**I.H. No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

**I.I. Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

**I.J. Inspection and Entry.**

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

**I.K. Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

**I.L. Compliance Certification.**

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than **February 15, 2004** and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and

whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
EPA, Region VIII  
999 18th Street, Suite 300  
Denver, CO 80202-2466

**I.M. Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

**I.N. Emergency Provision.**

I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))

I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))

I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))

I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))

I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))

I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

**I.O. Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

**I.P. Off-permit Changes.**

Off-permit changes are governed by R307-415-7d(2).

**I.Q. Administrative Permit Amendments.**

Administrative permit amendments are governed by R307-415-7e.



I.R.        **Permit Modifications.**

Permit modifications are governed by R307-415-7f.

I.S.        **Records and Reporting.**

I.S.1        Records.

I.S.1.a        The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

I.S.1.b        For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

I.S.1.b.1        The date, place as defined in this permit, and time of sampling or measurement.

I.S.1.b.2        The date analyses were performed.

I.S.1.b.3        The company or entity that performed the analyses.

I.S.1.b.4        The analytical techniques or methods used.

I.S.1.b.5        The results of such analyses.

I.S.1.b.6        The operating conditions as existing at the time of sampling or measurement.

I.S.1.c        Additional record keeping requirements, if any, are described in Section II, Special Provisions.

I.S.2        Reports.

I.S.2.a        Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))

I.S.2.b        All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))

I.S.2.c        The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

I.S.3 Notification Addresses.

I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality  
P.O. Box 144820  
Salt Lake City, UT 84114-4820  
Phone: 801-536-4000

I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and  
Environmental Justice (mail code 8ENF)  
999 18th Street, Suite 300  
Denver, CO 80202-2466

For reports, notifications, or other correspondence  
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII  
Office of Partnerships & Regulatory Assistance  
Air & Radiation Program (mail code 8P-AR)  
999 18th Street, Suite 300  
Denver, CO 80202-2466  
Phone: 303-312-6440

I.T. **Reopening for Cause.**

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U.      **Inventory Requirements.**

I.U.1          An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.U.2          A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

## **Section II: SPECIAL PROVISIONS**

### **II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.**

(R307-415-4(3)(a) and R307-415-4(4))

#### **II.A.1 Down Draft Paint Booths** (designated as 1)

Unit Description: Four booths equipped with particulate filters

#### **II.A.2 Horizontal Draft Spray Booth** (designated as 2)

Unit Description: Touch-up booth equipped with particulate filters

#### **II.A.3 Bake Ovens** (designated as 3)

Unit Description: Two bake ovens with electric heating elements No unit-specific applicable requirements.

#### **II.A.4 Building Heaters** (designated as 4)

Unit Description: Two natural gas fired space heaters with approximate ratings of 7.32 MM Btu/hr each No unit-specific applicable requirements.

### **II.B. Requirements and limitations.**

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

#### **II.B.1 Conditions on permitted source (Source-wide)**

##### **II.B.1.a Condition:**

Emissions of VOC shall be no greater than 95 tons per 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0052003-03]

##### **II.B.1.a.1 Monitoring:**

Compliance with the limitation shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 7 days after the end of each calendar month.

##### **II.B.1.a.2 Recordkeeping:**

VOC emissions shall be determined by maintaining a record of VOC emitting materials used each month. The records shall include the following data for each material used:

1. Name of the VOC emitting material, such as; paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
2. Density of each material used (pounds per gallon).
3. Percent by weight of VOC in each material used.
4. Gallons of each VOC emitting material used each month.
5. The amount of VOC emitted monthly by each material used, calculated by the following procedure:

$$\text{VOC} = \frac{(\% \text{ VOC by Weight})}{(100)} \times \frac{(\text{Density lb})}{(\text{gal})} \times (\text{gal Consumed}) \times \frac{(1 \text{ ton})}{(2,000 \text{ lb})}$$

6. The total amount of VOC emitted monthly from all materials used.
7. The amount of VOCs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above, to provide the monthly total VOC emissions.

II.B.1.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.b

**Condition:**

Emissions of total combined hazardous air pollutants (HAP) from the permitted source shall be no greater than 65 tons per 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0052003-03]

II.B.1.b.1

**Monitoring:**

Compliance with the limitation shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 7 days after the end of each calendar month.

II.B.1.b.2

**Recordkeeping:**

HAP emissions shall be determined by maintaining a record of HAP emitting materials used each month. The records shall include the following data for each material used:

1. Name of the HAP emitting material, such as; paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
2. Density of each material used (pounds per gallon).
3. Percent by weight of HAP in each material used.
4. Gallons of each HAP emitting material used each month.
5. The amount of HAP emitted monthly by each material used, calculated by the following procedure:

$$\text{HAP} = \frac{(\% \text{ HAP by Weight})}{(100)} \times \frac{(\text{Density lb})}{(\text{gal})} \times (\text{gal consumed}) \times \frac{(1 \text{ ton})}{(2,000 \text{ lb})}$$

6. The total amount of HAP emitted monthly from all materials used.
7. The amount of HAP's reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above, to provide the monthly total HAP emissions.

II.B.1.b.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.c

**Condition:**

Paint applications using equipment having a transfer efficiency less than 65% shall not exceed 400 gallons per rolling twelve month period. All other applications shall be made using spray equipment having a manufacturer's rated transfer efficiency of 65% or greater. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0052003-03]

II.B.1.c.1

**Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.c.2

**Recordkeeping:**

For applications where the transfer efficiency was less than 65%, monthly records of paint consumption shall be kept. Compliance with the gallons limit shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 7 days after the end of each calendar month.

For paint applications required by this permit to have a minimum transfer efficiency of 65%, manufacturer's specifications and supporting information demonstrating the transfer efficiency of that equipment shall be kept onsite.

II.B.1.c.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2

**Conditions on Down Draft Paint Booths ( 1 )**

II.B.2.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0052003-03]

II.B.2.a.1

**Monitoring:**

In lieu of monitoring via visible emissions observations, the spray booth particulate capture system shall be inspected to demonstrate that it is functioning properly. Inspections shall consist of the following observations made at the specified frequencies:

- (A) Inspection for holes in the particulate filters- weekly.
- (B) Inspection of the particulate filters to determine proper installation within the support rack- weekly.
- (C) Inspection of the exhaust fan to ensure that it is operating- whenever the spray booths begin operation.

II.B.2.a.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.2.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3

**Conditions on Horizontal Draft Spray Booth ( 2)**

II.B.3.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0052003-03]

II.B.3.a.1

**Monitoring:**

In lieu of monitoring via visible emissions observations, the spray booth particulate capture system shall be inspected to demonstrate that it is functioning properly. Inspections shall consist of the following observations made at the specified frequencies:

- (A) Inspection for holes in the particulate filters- daily.
- (B) Inspection of the particulate filters to determine proper installation within the support rack- daily.
- (C) Inspection of the exhaust fan to ensure that it is operating- whenever the spray booth begins operation.

II.B.3.a.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.3.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C.

**Emissions Trading.**

(R307-415-6a(10))

Not applicable to this source.

II.D.

**Alternative Operating Scenarios.**

(R307-415-6a(9))

Not applicable to this source.

**Section III: PERMIT SHIELD**

A permit shield was not granted for any specific requirements.

**Section IV: ACID RAIN PROVISIONS.**

**This source is not subject to Title IV. This section is not applicable.**

## REVIEWER COMMENTS

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This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-AN0052003-03

dated April 25, 2003

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**1. Comment on an item originating in AO DAQE-AN0052003-03, Condition #12 regarding Down Draft Paint Booths (Unit 1)**

AO condition stipulating that air must pass through particulate filters: Conditions in this operating permit specifying the operation and maintenance of the particulate capture system will be used to demonstrate the proper functioning of that system in lieu of the AO condition stipulating that air must pass through particulate filters. If the fan is working, and the filters are in place, air will pass through the filters unless they happen to be clogged. In the event that the filters are clogged, painting will not be possible because over-spray will accumulate and ruin the finish. [Comment last updated on 4/25/2003]

**2. Comment on an item originating in AO DAQE-AN0052003-03,, Condition #12 regarding Horizontal Draft Spray Booth (Unit 2)**

AO condition stipulating that air must pass through particulate filters: Conditions in this operating permit specifying the operation and maintenance of the particulate capture system will be used to demonstrate the proper functioning of that system in lieu of the AO condition stipulating that air must pass through particulate filters. If the fan is working, and the filters are in place, air will pass through the filters unless they happen to be clogged. In the event that the filters are clogged, painting will not be possible because over-spray will accumulate and ruin the finish. [Comment last updated on 4/25/2003]

**3. Comment on an item originating in AO condition 14 regarding permitted source (Source-wide)**

AO condition stipulating proper operation and maintenance: Conditions in this operating permit requiring inspections of particulate filters will be used to demonstrate the proper operation and maintenance of the paint booths in lieu of AO condition 14. [Comment last updated on 4/25/2003]

**4. Comment on an item originating in this permit regarding Down Draft Paint Booths (Unit 1)**

Particulate Filter Monitoring Frequency: For the down draft booths, a weekly monitoring frequency for filter fit and filter holes is considered to be reasonable because the booth design provides a high degree of protection of the filters from damage.

For the horizontal draft booth, a daily monitoring frequency for filter fit and filter holes is considered to be reasonable because the filters are exposed to potential damage during daily operations. [Comment last updated on 3/03/1998]



**5. Comment on an item originating in AO DAQE-AN0052003-03, Condition #10 regarding permitted source (Source -wide)**

Painting operations: Paint applicators (usually non HVLP paint guns) having a transfer efficiency less than 65% are used for touch up painting; the use of this equipment is limited to no more than 400 gallons per rolling twelve month period.

All other paint applications at this source must be done using equipment having a transfer efficiency greater than 65% (usually, but not limited to HVLP spray equipment). [Comment last updated on 4/25/2003]

**6. Comment on an item originating in AO DAQE-AN0052003-03, Condition #11 regarding Building Heaters (Unit 4)**

Ten percent opacity limit can not be applied to space heaters: Because the space heaters are located indoors, it is not feasible to conduct visible emissions observations on that equipment. [Comment last updated on 4/25/2003]